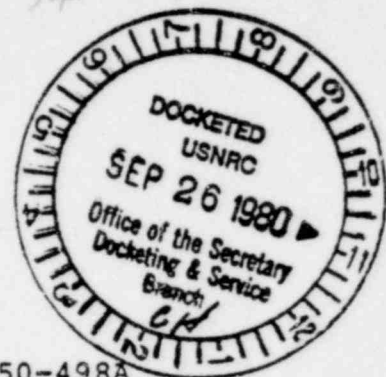


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of:)
)
HOUSTON LIGHTING AND POWER) Docket Nos. 50-498A
CO., et al. (South Texas) 50-499A
Project, Units 1 and 2))

COMMENTS OF SOUTH TEXAS ELECTRIC COOPERATIVE, INC.
AND MEDINA ELECTRIC COOPERATIVE, INC. ON
STIPULATION AND PROPOSED
LICENSING CONDITIONS

South Texas Electric Cooperative, Inc. and Medina Electric Cooperative, Inc. (STEC/MEC), intervenors herein, have examined the License Conditions for the South Texas Project, Units No. 1 and 2, dated September 12, 1980, agreed to by stipulation of the Department of Justice, NRC staff, Houston Lighting and Power Company, Central and South West Corporation, City of Austin*, and the City Public Service Board of San Antonio*. These conditions and the accompanying stipulation were transmitted to the Board in conjunction with Settlement Status Reports filed September 15, 1980. During a prehearing conference convened by the Board on that date, September 24, 1980 was designated as the date for submission of written comments by other interested parties. By motion filed September 24, 1980, STEC/MEC requested a one-day extension of that deadline.

STEC/MEC generally support incorporation of these proposed conditions into the operating license to be issued for the South Texas Project, Units No. 1 and 2. While STEC/MEC do not believe that these conditions represent a guaranteed solution to all problems which gave rise to this antitrust proceeding, STEC/MEC are of the opinion that, considered as a whole, these conditions go a long way toward avoiding a recurrence of the operating crisis which occurred during the period 1976-1977, following bifurcation of the Texas Interconnected System. Prevention of such a recurrence is, and has been, one of STEC/MEC's primary objectives in participating in this proceedings.

* At the time this Stipulation was filed with the Board, the relevant governing bodies of the cities of Austin and San Antonio had not formally approved its endorsement. STEC/MEC understand that such endorsement has now been obtained, or will be obtained in the near future.

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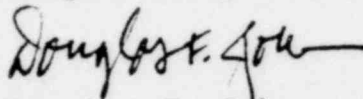
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Adoption of a similar set of license conditions for the Comanche Peak Project should provide an additional measure of operational security for TIS members and their customers.

For these reasons, STEC/MEC recommend that the Board issue an order accepting and approving these proposed conditions. STEC/MEC do, however, expressly reserve the right to participate as a full party in any hearing which may eventuate in this proceeding. *

Respectfully submitted,



Douglas F. John
McDERMOTT, WILL & EMERY
Suite 500
1850 K Street, N.W.
Washington, D.C. 20006

Attorney for:

South Texas Electric Cooperative, Inc.
and
Medina Electric Cooperative, Inc.

OF COUNSEL:

Morgan Hunter, Esquire
McGINNIS, LOCHRIDGE & KILGORE
Texas State Bank Building
Fifth Floor
900 Congress Avenue
Austin, Texas 78701

Dated: September 25, 1980

* This reservation applies to any hearing which may be convened as a result of a finding by the Board that the stipulation on its face has not been shown to represent fair and legal resolution of all issues in this proceeding, as well as to any hearing which may be convened upon motion of Central and South West Corporation pursuant to the authority which, according to its September 15, 1980 Status Report, it has reserved to itself in entering into the instant stipulation.